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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of

Federal Communications Commission
Office of Secretary

Amendment of Section 73.202(b))
Table of Allotments) MB Docket No. 04-19
FM Broadcast Stations) RM - 10845
(Talladega and Munford, Alabama))
)

DOCKET FILE COPY ORIGINAL

To: Office of the Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

RESPONSE TO "REQUEST FOR SUPPLEMENTAL INFORMATION"

Jacobs Broadcast Group, Inc. ("Jacobs"), licensee of Station WTDR(FM), Talladega, Alabama, by its counsel, hereby submits its response to the Media Bureau's "Request for Supplemental Information" (the "Request") released on April 27, 2005. See DA 05-1149. In support hereof, Jacobs states as follows:

1. In its Request, the Bureau asked Jacobs to submit a *Tuck* showing to demonstrate Munford's independence from the Anniston, Alabama Urbanized area. *Faye and Richard Tuck*, 3 FCC Rcd 5374 (1988) ("*Tuck*"). Jacobs maintains that a *Tuck* showing is not required because under Jacobs' proposal, the 70 dBu contour covers less than 50% of the Anniston Urbanized Area. See, e.g., *Headland, Alabama and Chattahoochee, Florida*, 10 FCC Rcd 10352, ¶ 11 (1995) ("*Headland*"). In addition, Munford is not located within the Anniston Urbanized Area. Nevertheless, as requested by the Commission staff, Jacobs submits the following *Tuck* showing to demonstrate Munford's independence from the Anniston Urbanized Area:

2. Under *Tuck*, in making the determination whether to award a community a first local service preference, the Commission will consider (1) the extent to which the station will

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provide service to the entire Urbanized Area, (2) the relative populations and proximity of the proposed community and central city, and, most importantly, (3) the independence of the proposed community. *Tuck*, 3 FCC Rcd at 5377-78. Here, from its current transmitter site, Station WTDR(FM) will continue to place a 70 dBu contour over less than 30% of the Anniston Urbanized Area. Munford's population (2000 U.S. Census 2,446) is 10% of that of Anniston (2000 U.S. Census 24,276), and Munford is located approximately 19 kilometers from Anniston. These figures are similar to those of other suburban communities granted a first local preference. *See, e.g., Old Fort, Fletcher, and Asheville, North Carolina; Surgoinsville, Tennessee, and Augusta, Georgia*, 18 FCC Rcd 12181 (2003) (Fletcher's population is 6.7% of that of Asheville, and Fletcher is located 17 kilometers from Asheville); *Malvern and Bryant, Arkansas*, 14 FCC Rcd 3576 (1999) (Bryant's population is 3% of that of Little Rock, and Bryant is located 20 miles from Little Rock). Nevertheless, the Commission has repeatedly stated that these factors are less important than evidence of independence. *See Headland*, 10 FCC Rcd at 10355. The following analysis of the eight *Tuck* factors demonstrates the independence of Munford from Anniston:

(1) *Extent to which the residents of Munford work in Munford.* The 2000 U.S. Census population of Munford is 2,446. According to the 2000 U.S. Census, 127 of the 870 employed individuals in Munford, or 14.6%, work in Munford. *See Exhibit 1.* This percentage compares favorably with other independent communities. *See, e.g., Albemarle and Indian Trail, North Carolina*, 16 FCC Rcd 13876 (2001) (11.3% of working-age residents worked in community); *Coolidge and Gilbert, Arizona*, 11 FCC Rcd 3610 (1996) (13% of Gilbert's working population actually worked in Gilbert).

(2) *Newspapers and other media that cover Munford's local needs and interests.* The *Daily Home* is a regional newspaper that covers the local needs and interests of Munford. It is published daily and, in addition to home delivery, the paper can be viewed online at <<http://www.dailyhome.com/dh-index.htm>>. The newspaper includes local news articles, local sports articles, local obituaries, local editorials and opinions, and local classifieds. This newspaper does not serve Anniston.¹ See Exhibit 1.

(3) *Community leaders and residents perceive Munford as being separate from Anniston.* Munford has developed its own identity and the residents perceive themselves as distinct from Anniston. Munford is an incorporated municipality located within Talladega County. According to D. Lynn Swinford, Mayor of the Town of Munford, in 1999, the citizens of Munford initiated a campaign for incorporation in order to separate the community from the City of Oxford, Alabama because Oxford was expanding at a such a rapid pace that it might annex Munford. In August 2002, an election was held and the community voted for incorporation. Munford was officially incorporated on August 20, 2002. Mayor Swinford indicates that the town is anticipating steady growth over the next several years pursuing opportunities to expand and build the governmental infrastructure to provide additional services to the local residents. A letter from Mayor Swinford is attached as Exhibit 2. Also, attached as Exhibit 3, are questionnaires completed by Jennifer Carter who works as a registered pharmacist at Carter's Drug in Munford and Stella Fowler who is the Office Clerk at

¹ The *Daily Home* is owned by Consolidated Publishing which also publishes several other newspapers in the region including the *Anniston Star*. However, the *Daily Home* operates separate from the *Anniston Star* in regard to editorial content and advertising sales.

the Munford Water Department. Both Ms. Carter and Ms. Fowler are residents of Munford.² These questionnaires also demonstrate that the residents of the community perceive Munford as separate from Anniston.

(4) *Munford has its own local government and elected officials.* The Town of Munford is governed by a Mayor and five member Town Council that meets in the Munford Municipal Building on the first Tuesday of each month. The Mayor and Council members each serve four year terms. The Munford Town Manager/Treasurer is responsible for the administration of the Munford government. According to Mayor Swinford, the Town plans to appoint additional officials and create several departments to provide such services as planning and zoning, permits and fees, code enforcement, police, public works, parks and recreation, road maintenance, and sanitation. According to Mayor Swinford, the Munford Water Authority is a public entity whose board members are appointed by the Talladega County Commission. The State of Alabama has a Department of Transportation Field Office in Munford. *See Exhibits 1 and 2.*

(5) *Munford has its own zip code and phone book.* The zip code assigned to Munford is 36268, and the U.S. Postal Service operates an office in Munford. Bell South publishes the Greater Talladega County Telephone Directory, which contains listings for the community of Munford and does not contain listings for the community of Anniston. *See Exhibit 1.*

(6) *Munford has its own commercial establishments and health facilities.*

Munford is home to a variety of businesses and commercial establishments. A number of

² Ms. Fowler lives at 43590 Alabama Highway 21 in Munford, and Ms. Carter lives at 934 Mountain View Circle in Munford.

local businesses identify with the community by using “Munford” in their name, including Munford Headstart, Munford Heating & Cooling, Munford Machine, Inc., Munford Mini-Storage, and Munford Village Apartments. Other local businesses include Pickette’s Supermarket, Big Daddy BBQ, Eastern Bail Bonds, First National Bank – Munford Branch, Evelyn’s Bakery, and Carter’s Hardware and Auto Parts. *See Exhibit 1.*

Health care is provided to the community of Munford by Baptist Health Center of Munford and Munford Health Clinic. Munford is also home to a number of religious organizations, including the Shady Grove Baptist Church, Church of God of Prophecy, First Missionary Baptist Church, Munford Church of Christ, Munford United Methodist Church, and Shiloh Missionary Baptist Church. Community organizations in Munford include Munford Little League and Munford Youth Athletics. *See Exhibit 1.*

(7) *Munford is a separate and distinct advertising market from Anniston.* The *Daily Home* provides the businesses of Munford with a place to advertise to the residents of Munford without relying on the Anniston advertising market. *See Exhibit 1.*


(8) *Munford has its own schools, police department and fire department.* The Talladega County School System provides K-12 education to the community of Munford. The schools located in Munford are Munford Elementary, Munford Middle School, and Munford High School. Munford’s fire protection is provided by the Munford Volunteer Fire Department. The County of Talladega provides police protection and enforcement services for the Town of Munford. *See Exhibit 1.*

3. Munford is clearly independent of Anniston and therefore deserving of a first local service. As demonstrated above, Munford satisfies all of the independent community indicia required by *Tuck*.

WHEREFORE, for the foregoing reasons, the Bureau should promptly issue a *Report and Order* in this proceeding allotting Channel 224A from Talladega to Munford, Alabama as that community's first local service.

Respectfully submitted,

JACOBS BROADCAST GROUP, INC.

By: 

Mark N. Lipp
Scott Woodworth
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1455 Pennsylvania Avenue, NW
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Its Counsel

June 20, 2005

EXHIBIT 1



U.S. Census Bureau

American FactFinder

FACT SHEET

Munford CDP, Alabama

Census 2000 Demographic Profile Highlights:

General Characteristics - show more >>

	Number	Percent	U.S.		
Total population	2,446	100.0	100%	map	brief
Male	1,186	48.5	49.1%	map	brief
Female	1,260	51.5	50.9%	map	brief
Median age (years)	33.6	(X)	35.3	map	brief
Under 5 years	164	6.7	6.8%	map	
18 years and over	1,772	72.4	74.3%		
65 years and over	268	11.0	12.4%	map	brief
One race	2,421	99.0	97.6%		
White	1,732	70.8	75.1%	map	brief
Black or African American	669	27.4	12.3%	map	brief
American Indian and Alaska Native	12	0.5	0.9%	map	brief
Asian	0	0.0	3.6%	map	brief
Native Hawaiian and Other Pacific Islander	1	0.0	0.1%	map	brief
Some other race	7	0.3	5.5%	map	
Two or more races	25	1.0	2.4%	map	brief
Hispanic or Latino (of any race)	4	0.2	12.5%	map	brief
Household population	2,446	100.0	97.2%	map	brief
Group quarters population	0	0.0	2.8%	map	
Average household size	2.68	(X)	2.59	map	brief
Average family size	3.05	(X)	3.14	map	
Total housing units	980	100.0	100.0%	map	
Occupied housing units	912	93.1	91.0%		brief
Owner-occupied housing units	778	85.3	66.2%	map	
Renter-occupied housing units	134	14.7	33.8%	map	brief
Vacant housing units	68	6.9	9.0%	map	

Social Characteristics - show more >>

	Number	Percent	U.S.		
Population 25 years and over	1,371	100.0			
High school graduate or higher	1,001	73.0	80.4%	map	brief
Bachelor's degree or higher	157	11.5	24.4%	map	
Civilian veterans (civilian population 18 years and over)	205	12.9	12.7%	map	brief
Disability status (population 21 to 64 years)	347	28.3	19.2%	map	brief
Foreign born	0	0.0	11.1%	map	brief
Male, Now married (population 15 years and over)	492	60.3	56.7%		brief
Female, Now married (population 15 years and over)	501	61.0	52.1%		brief
Speak a language other than English at home (population 5 years and over)	24	1.2	17.9%	map	brief

Economic Characteristics - show more >>

	Number	Percent	U.S.		
In labor force (population 16 years and over)	944	58.0	63.9%		brief
Mean travel time to work in minutes (population 16 years and over)	21.4	(X)	25.5	map	brief
Median household income (dollars)	35,109	(X)	41,994	map	
Median family income (dollars)	39,205	(X)	50,046	map	
Per capita income (dollars)	15,346	(X)	21,587	map	
Families below poverty level	5	0.9	9.2%	map	brief
Individuals below poverty level	106	5.2	12.4%	map	

Housing Characteristics - show more >>

	Number	Percent	U.S.		
Single-family owner-occupied homes	393	100.0			brief
Median value (dollars)	57,800	(X)	119,600	map	brief
Median of selected monthly owner costs	(X)	(X)			brief

U.S. Census Bureau

American FactFinder

P27. PLACE OF WORK FOR WORKERS 16 YEARS AND OVER--PLACE LEVEL [5] - Universe:
Workers 16 years and over

Data Set: Census 2000 Summary File 3 (SF 3) - Sample Data

NOTE: Data based on a sample except in P3, P4, H3, and H4. For information on confidentiality protection, sampling error, nonsampling error, and definitions see <http://factfinder.census.gov/home/en/datanotes/expsf3.htm>.

	Munford CDP, Alabama
Total:	870
Living in a place:	870
Worked in place of residence	127
Worked outside place of residence	743
Not living in a place	0

U.S. Census Bureau
Census 2000

Standard Error/Variance documentation for this dataset:

Accuracy of the Data: Census 2000 Summary File 3 (SF 3) - Sample Data (PDF 141.5KB)

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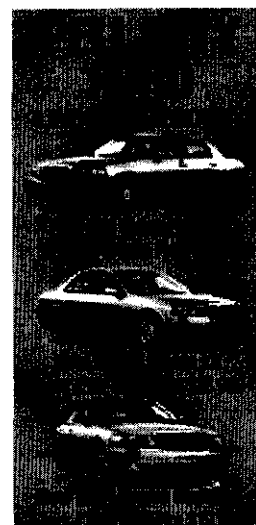
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TALLADEGA COUNTY

Support growing for Senior Citizens Center in Munford

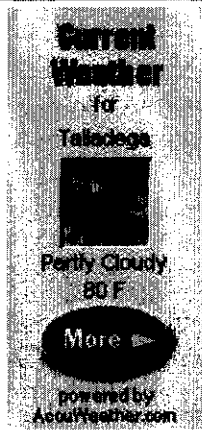
By Gabe Carpenter
03-16-2005

MUNFORD — The Senior Citizens Center is receiving a lot of support from local organizations and the community, but there is still a ways to go before the town achieves what it set out to do.

"We've got a green light, but we just don't know what the speed limit is yet," said Sandra Swinford, chairman of the Senior Citizens Advisory Council.

The group currently meets in the lunchroom of the old high school, but a feasibility study must be conducted to determine whether it's in the town's best interest to take over responsibility of the school building. The facility has a few leaks and, upon investigation, more problems may be found.

But if the building doesn't work out, they'll simply find another place to meet.



"We're very optimistic about it, but we try not to get our hopes up too much," Swinford said.

Once a month an average of 50 seniors gather for an educational program. At those meetings, meals are served and prizes are given away.

The group also offers a game day where, once a month, the seniors gather for a game of bingo.

The programs are part of the specifications the center must meet in order to fulfill state guidelines, Swinford said. The only one they lack right now is an exercise program, but that is their next step.

The center may also get a meals-on-wheels type program going. But first they must recruit volunteers and transportation.

If they find a van, they would be able to transport seniors to the center and take them to doctor visits.

"I really believe that's going to be in the picture next year, but it just depends on how it goes," Swinford said.

In the end, they may also have a prescription drug program for the seniors.

"Another area we have to address is handicap bathrooms," Swinford said. The facility itself is accessible to the handicapped.

The center recently bid on various pieces of equipment from the school's lunchroom. They were able to get most of it and keep the building's structure intact.

Most of the equipment is unnecessary for the center's needs at this time, but Swinford believes that it will be useful for large suppers and fund-raisers for the center.



"We're trying to make it so it will be something everybody in the community will be able to use," she said.

The town is working with the East Alabama Regional Planning and Development Commission to find and secure grants to fund the center.

"I'm just very excited about it, and I don't see any problem but time," Swinford said.

If all goes as planned, they should be officially moved in to the old lunchroom by late summer.

"I can't wait to see if we meet our goals in August, because that's what we're shooting for," she said.

About Gabe Carpenter

Gabe Carpenter is a staff writer for The Daily Home.

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TALLADEGA COUNTY

Munford school receives environmental awards

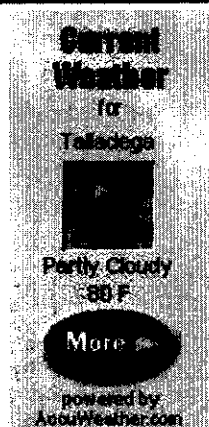
Amanda Casciaro
01-28-2005

For Talladega County Board of Education members and faculty at Munford Elementary, school is about a lot more than just reading, writing and arithmetic.

It's about "Discovering Through Nature the Enchantment of Learning," a phrase painted above the stage in the school's auditorium.

And Thursday night, people throughout the county realized that it's paid off.

At the board's meeting, Arthur Hitt from the Talladega County Forestry Commission announced the school was chosen for two prestigious awards: the Demonstration Treasure Forest Award and the W. Kelly Mosley Environmental Award for Achievements in Forestry, Wildlife and Related Resources.



For Munford Elementary, the awards were especially important because wildlife is what the school is based on.

Children walk through halls displayed with educational exhibits that give them a unique insight into wildlife, pass through artificial trees that line the main hallway, and eat lunch in front of a 500-gallon aquarium that gives them an inside-look into aquatic life.

They are lessons that go beyond the classrooms, and for the students in Munford, it's part of their everyday life.

The Demonstration Treasure Forest Award has been given to only three other locations in the state that have demonstrated good management and forest stewardship skills, and forest preservation techniques.

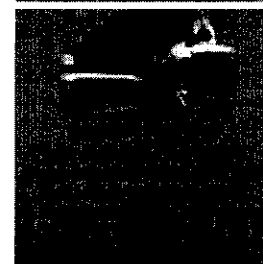
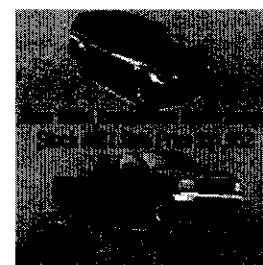
The W. Kelly Environmental Award is presented through Auburn University to individuals or groups that "publicly recognize and support achievements, which result in the wiser use and renewal of natural resources," according to a brochure from Auburn University.

Dr. Richard W. Brinker, dean and professor in the School of Forestry and Wildlife Sciences at Auburn, presented Munford principal Becky Robinson with a plaque, a print of Kelly Mosley's native home, Pineland, and a \$500 check.

"You know, many people are nominated, and there's a screening committee of people around the state, the forestry and fishery faculty at Auburn University ...," Brinker said. "This is just a great place to teach kids about the natural resources."

"I cannot comprehend all this school has won," said schools Superintendent Cindy Elsberry. "Environmental issues are important to the state, and the fact that this school is in the foothills of Cheaha National Forest, it's appropriate that it receives this recognition."

In other business, the board:



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o Heard presentations from several schools commending board members for their accomplishments and support of students throughout the county. In honor of Board Member Recognition Month, school representatives showered members with gifts of all kinds. Jay Haynes, Student Government Association president at Munford High School, presented each board member with a key to the school in appreciation for their efforts in making the new facility a reality. "My words fail to describe the gratitude we have for the board members of Talladega," Haynes said.

Representatives from Fayetteville, Lincoln High, Pittard School of Technology, B.B. Comer High School and others each stepped up to congratulate board members on their dedication to the system and to the students.

"I commend you for supporting actions that are in the best interest of our children," Elsberry said.

o Approved personnel actions, which included retirement announcements by Assistant Superintendent Nancy Cotter and Dorothy Wright, coordinator of elementary education and federal programs, who have worked for the board for 33 and 29 years, respectively. Jeff Steers, a new mathematics teacher who will start at B.B. Comer High School next school year, was also recognized as the new head football coach and athletic director for the school.

o Approved the financial reports for November and December 2004, which had excessive expenditures for construction costs, litigation fees and other expenses. Avery Embry, custodian of funds for the county, reported the board was under budget for December by 5.4 percent.

o Approved an amendment to the 2005 fiscal year budget that would allow the board to comply with several federal requirements and additional programs.

o Approved the purchase of 19 Automated External Defibrillators for schools that don't have the machines and three county shops. The bid

went to Cardiac Science for a cost of \$1,999 per AED, which will reduce once the county confirms the order of at least 15 machines.

o Heard a report by Jeff Goodwin, director of maintenance and operations, regarding construction taking place at schools throughout the county.

o Recognized Jane Ingram, media specialist at Munford Elementary, and Mary Barton, art teacher at B.B. Comer High, for their contributions to their respective schools.

o Approved the expulsion of four students.

o Approved a field trip for students at B.B. Comer High for a concert band competition at Six Flags Over Georgia May 7.

o Approved a policy regarding the handling of worthless checks.

o Set its next regular meeting for Feb. 24 at 5:30 p.m. in the Central Office, and a meeting March 31 at 5:30 p.m. in the Central Office.

About Amanda Casciaro

Amanda Casciaro is a staff writer for The Daily Home.

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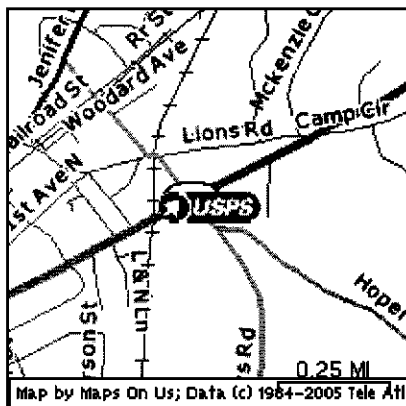

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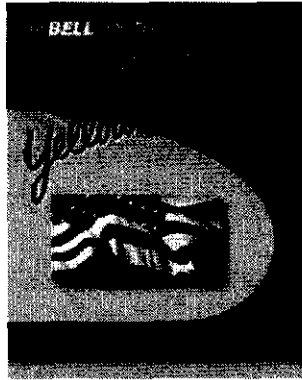
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All Businesses

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Business Name:	Address:
Church Of God Of Prophecy (256) 831-8558	946 Silver Run Rd Munford, AL Map
First Missionary Baptist Church (256) 362-1690	40684 Al Hwy 21 Munford, AL Map
Hallgrove Baptist Church (256) 358-0075	488 Hall Grove Rd Munford, AL Map
Kelly Springs Baptist Church (256) 761-1838	351 Curry Station Rd Munford, AL Map
Munford Church Of Christ (256) 358-4528	143 Main St Munford, AL Map
Munford United Methodist (256) 358-0039	92 Campbell Rd Munford, AL Map
Oak Grove Baptist Church (256) 362-4010	Oak Grove Rd Munford, AL Map
Shady Grove Baptist Church (256) 358-0016	801 Jenifer Rd Munford, AL Map
Shiloh Missionary Baptist Church (256) 835-1449	1233 Silver Run Rd Munford, AL Map
Stockdale Baptist Church (256) 362-5040	Stockdale Rd Munford, AL Map
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All Businesses

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Business Name:

Address:

Baptist Health Center Munford
(256) 358-455348 N Cedars Rd
Munford, AL [Map](#)**First National Bank Of Talladega Munford Branch**
(256) 358-9000Highway 21
Munford, AL [Map](#)**Munford Church Of Christ**
(256) 358-4528143 Main St
Munford, AL [Map](#)**Munford Headstart**
(256) 358-077349 Railroad St
Munford, AL [Map](#)**Munford Heating & Cooling**
(256) 358-49071217 Ambrester Ln
Munford, AL [Map](#)**Munford High School**
(256) 358-4521**Munford, AL** [Map](#)**Munford Machine Inc**
(256) 358-4848189 Patterson Dr
Munford, AL [Map](#)**Munford Mini Storage**
(256) 358-428544387 Al Hwy 21
MUNFORD, AL [Map](#)**Munford Tractor Co**
(256) 358-4035Highway 21
Munford, AL [Map](#)**Munford United Methodist**
(256) 358-003992 Campbell Rd
Munford, AL [Map](#)**Munford Village Apartments**
(256) 358-9999200 Mackenzie Cir
Munford, AL [Map](#)**Munford Volunteer Fire Department**
(256) 358-424343323 Al Hwy 21
Munford, AL [Map](#)**Post Office Munford**
(256) 358-423133 Cedars Rd
Munford, AL [Map](#)

Talladega County Schools Munford
(256) 358-9369

365 Cedars Rd
Munford, AL [Map](#)

Town Of Munford
(256) 358-9050

115 Lions Rd
Munford, AL [Map](#)

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Beyond Munford

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(by name or category)

Locations: 
(Address, Intersection or [Airport Code](#))

Address:
(Optional)

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City, State or Zip:

Country: 



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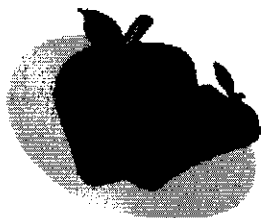
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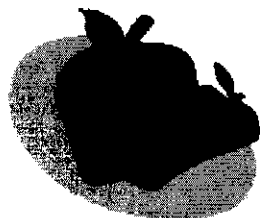
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Munford Elementary School

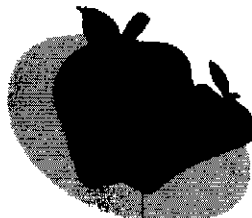
365 Cedars Road
Munford, AL 36268



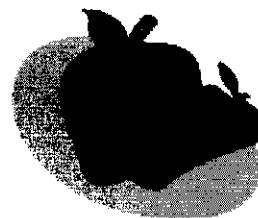
HOME



Calendar



Faculty



Students

*We prepare and challenge students
to become successful life long
learners.*

Talladega County Board of Education
Rachel Davis Heather Frieze

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1 6 6 7
Last Updated 03/01/04

MUNFORD MIDDLE SCHOOL

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Vanessa Scott
Principal

[MMS News!!](#)


360 Cedars Road
Munford AL 36260
256.315.5235

Our Vision

A community of learners who are connected to the world, reflecting teamwork, teaching, training and technology.



Angel Carter
Assistant Principal

[Gallery](#)

Our mission: To educate and challenge the individual student to develop to his/her maximum potential

Munford High School

"Home of the Mighty Lions"

300 Cedars Road
Munford, AL 36268
256-315-5220

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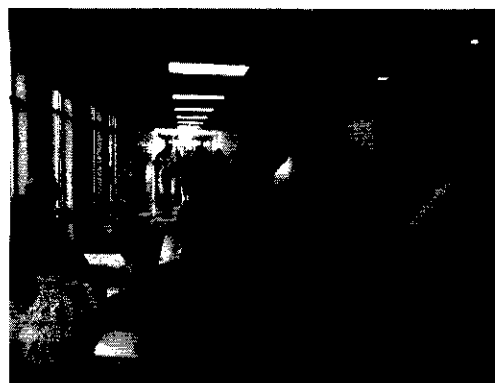
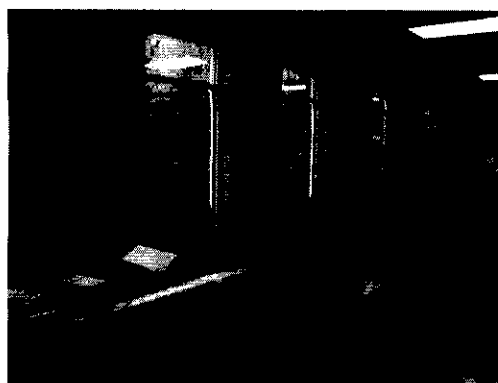
[Clubs](#)

[Parents](#)



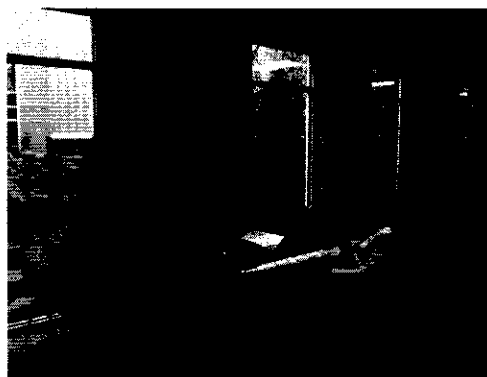
Virtual Tour

~~Click above to take a virtual tour of our new school~~ BOOK FAIR IS MAY 6th~~

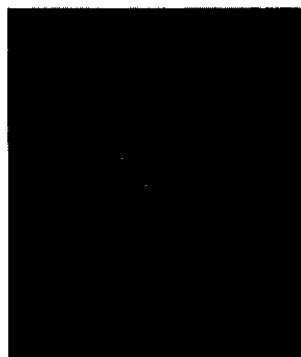


Thunder 92.7

**Friday February 4, 2005, Thunder 92.7 morning show was "Back in School"
at Munford High/Middle School**



Congratulations to Mrs. Cook for receiving Talladega County Teacher of the Year



**All about
students.**



Richard Shelby
United States Senator • Alabama

Press Release of Senator Shelby

SHELBY ANNOUNCES \$17,770 FOR THE MUNFORD VOLUNTEER FIRE DEPARTMENT

Contact: Virginia Davis (202) 224-6518
Wednesday, September 22, 2004

WASHINGTON, DC -- U.S. Senator Richard C. Shelby (R-AL) today announced that the Munford Volunteer Fire Department will receive \$17,770 in federal funds to assist with operations and firefighter safety. These funds are available for training and fitness, protective equipment, and modifications to fire stations and facilities.

These funds have been awarded by the Department of Homeland Security's Office for Domestic Preparedness, as a part of the Assistance to Firefighters Grant Program. This program will distribute \$750 million in direct federal assistance to firefighters nationwide this year.

"This is great news for the Munford Volunteer Fire Department. This grant provides critical support for our firefighters and local law enforcement, and I am pleased that the Department of Homeland Security is following through on its commitment to our nation's first responders," Sen. Shelby said.

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EXHIBIT 2



TOWN OF MUNFORD
P.O. BOX 10
MUNFORD, AL. 36268

D. LYNN SWINFORD, MAYOR

OFFICE-(256)-358-9050

FAX-(256)-358-9080

HOME-(256)-358-2974

CELL-(205)-215-6513

To Whom It May Concern:

In the latter part of 1999 and early 2000 the citizens of the Community of Munford, Alabama, located in the northern portion of Talladega County began a campaign to incorporate the Community of Munford. One of the main reasons for incorporating was to separate itself from the City of Oxford, which was expanding at a rapid pace and moving closer to Munford.

In August of 2002 an election was held and the Town of Munford was incorporated with a population of 1508...

The newly elected Mayor and (5) Council members took office in November of 2002. Now Munford was in control of its own growth and is not tied at all to the City of Oxford.

The Town of Munford has for many years had a very good and strong incorporated Water Board and Volunteer Fire Department which serves the Town of Munford and surrounding areas.

With the New Middle School and High School just completed and Munford Elementary only a few years old, Munford's future is looking to be very bright indeed.


D. Lynn Swinford, Mayor

EXHIBIT 3

QUESTIONNAIRE - for residents

- (1) Do you consider yourself to be part of Munford or the Anniston/Oxford area?

Munford

- (2) Do you regard the Town of Munford as a separate and distinct community with self-government or dependent on Anniston and Oxford for its services?

Separate community

- (3) Are you aware that Munford has its local government with an elected mayor and five member Town Council?

yes

- (4) Is your place of employment located in Munford?

yes

- (5) Do you consider the *Daily Home* your local newspaper?

yes

- (6) If so, do you read the *Daily Home* for local news articles, local sports articles, local editorials and opinions and local classifieds or do you rely on the Anniston newspaper for local information?

Both

- (7) Did you vote in the last Munford local election?

no

- (8) Do you use Talladega County BellSouth Telephone Directory for listings located in Munford?

yes

- (9) Do you visit at local Munford commercial establishments, health facilities, religious organizations and community organizations?

yes

- (10) If you need to place an advertisement, do you utilize the *Daily Home* or another source?

yes Daily Home

(11) Does your children attend schools operated by Talladega County School System that are located in Munford?

(12) Do you believe that the residents of the Town of Munford have developed their own identity distinct from Anniston?

yes

Submitted by: *Stella Fowler*

43590 Alabama Highway 21
Munford, Alabama 36268

QUESTIONNAIRE - for residents

- (1) Do you consider yourself to be part of Munford or the Anniston/Oxford area?

Munford

- (2) Do you regard the Town of Munford as a separate and distinct community with self-government or dependent on Anniston and Oxford for its services?

Separate

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Yes

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Yes

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Yes

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Both

- (7) Did you vote in the last Munford local election?

No

- (8) Do you use Talladega County BellSouth Telephone Directory for listings located in Munford?

Yes

- (9) Do you visit at local Munford commercial establishments, health facilities, religious organizations and community organizations?

Yes all of the above

- (10) If you need to place an advertisement, do you utilize the *Daily Home* or another source?

Yes

- (11) Does your children attend schools operated by Talladega County School System that are located in Munford?

Yes

- (12) Do you believe that the residents of the Town of Munford have developed their own identity distinct from Anniston?

Yes

Submitted by: Jennifer Carter, RPh

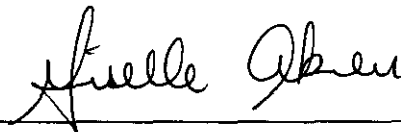
934 Mountainview Circle
Munford, Alabama 36268

CERTIFICATE OF SERVICE

I, Giselle Abreu, hereby certify that on this 20th day of June, 2005, a copy of the foregoing "**Response**" was sent via first-class mail, postage prepaid, to the following:

*R. Barthen Gorman, Esq.
Audio Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Howard M. Weiss, Esq.
Fletcher, Heald, & Hildreth PLC
1300 N. 17th Street
11th Floor
Arlington, VA 22209-3801
(*Counsel to Calhoun Communications*)



Giselle Abreu

* Hand delivery